

1 KELLY M. KLAUS (SBN 161091)
kelly.klaus@mto.com
2 BLANCA F. YOUNG (SBN 217533)
blanca.young@mto.com
3 STEPHANIE G. HERRERA (SBN 313887)
stephanie.herrera@mto.com
4 SHANNON AMINIRAD (SBN 324780)
shannon.aminirad@mto.com
5 MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
6 San Francisco, California 94105-2907
Telephone: (415) 512-4000
7 Facsimile: (415) 512-4077

8 JOHN L. SCHWAB (SBN 301386)
john.schwab@mto.com
9 ANNE K. CONLEY (SBN 307952)
anne.conley@mto.com
10 ROWLEY J. RICE (SBN 313737)
rowley.rice@mto.com
11 MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
12 Los Angeles, California 90071-3426
Telephone: (213) 683-9100
13 Facsimile: (213) 687-3702

14 *Attorneys for Defendant*

15 UNITED STATES DISTRICT COURT
16
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 REARDEN LLC and REARDEN MOVA
LLC,

20 Plaintiffs,

21 vs.

22 WALT DISNEY PICTURES, a California
23 Corporation,

24 Defendant.

Case No. 4:17-cv-04006-JST-SK

**SUPPLEMENTAL DECLARATION OF
ROWLEY J. RICE REGARDING
COURT'S ORDER RE SEALING [DKT.
484]**

Judge: Hon. Jon S. Tigar
Ctm.: 6 (2nd Floor)

1 I, Rowley J. Rice, hereby declare:

2 1. I am admitted to practice before all of the courts of the State of California and this
3 Court. I am an attorney in the law firm of Munger, Tolles & Olson LLP, counsel for Defendant in
4 the above-captioned matter. I submit this declaration and the attached exhibits in response to the
5 Court's Supplemental Order Granting Defendants' Administrative Motion to Consider Whether
6 Plaintiffs' Material Should be Sealed in Connection with Defendants' Reply Briefs in Support of
7 Defendants' Motion for Summary Judgment and *Daubert* Motions [Dkt. 460] dated September 11,
8 2023 [Dkt. 484].

9 2. This declaration attaches the following exhibits.

10 3. Exhibit 21 to Reply Klaus Declaration in Support of Defendant's Motion for
11 Summary Judgment [Dkt. 462], a public version of the document previously filed under seal at
12 Dkt. 460-4.

13 4. Exhibit A to Reply Klaus Declaration in Support of Defendant's Motion to Exclude
14 Portions of Alberto Menache's Testimony [Dkt. 463], a public version of the document previously
15 filed under seal at Dkt. 460-5.

16 5. Exhibits 1 and 2 to Reply Klaus Declaration in Support of Defendant's Motion to
17 Exclude Portions of Philip Fier's Testimony [Dkt. 464], public versions of the documents
18 previously filed under seal at Dkts. 460-8 and 460-9, respectively.

19 6. REDACTED Version of Defendants' Reply in Support of Motion to Exclude
20 Portions of Philip Fier's Testimony [Dkt. 464], a public version of the document previously filed
21 under seal at Dkt. 460-7. The documents contains redactions pursuant to the Court's order
22 granting Defendants' Administrative Motion to File Under Seal in Connection with Defendants'
23 Reply Briefs in Support of Defendants' Motion for Summary Judgment and *Daubert* Motions
24 [Dkt. 459].

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct and that I executed this declaration this 18th day of September 2023 at Los
3 Angeles, California.

4
5 /s/ Rowley J. Rice
6 ROWLEY J. RICE
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28